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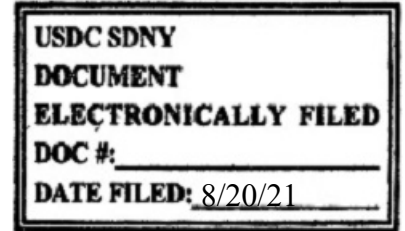
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August 19, 2021

By ECF

Honorable Barbara C. Moses
United States Magistrate Judge
500 Pearl Street
New York, NY 10007



Re: **Wynter v. Victoria's Secret Stores, LLC, 20 CV 2429 (PGG) (BCM)**

Dear Judge Moses:

This firm represents Plaintiff Cynn Wynter in this employment discrimination action. I am writing on behalf of all parties jointly to request an immediate stay of discovery until November 22, 2021, and an extension of time to complete discovery from November 23 through December 17, 2021. This is the first request in this action for a stay of discovery, and the second request for an extension of time to complete discovery.

As we discussed with the Court during our August 3, 2021 status conference, the parties were exploring the possibility of a private mediation, following the eight depositions taken to date. The parties have now selected a mediator, Dina Jansenson, and engaged her for a mediation on November 22, 2021. Ms. Jansenson is a mediator highly respected and sought by both plaintiffs and defendants alike in employment discrimination cases; her calendar is booked until mid-November, and the parties scheduled the mediation for one of her first available dates.

The parties believe they will have sufficient time to complete all remaining depositions and discovery in the four weeks following the November 22 mediation if the case does not settle in mediation.

The parties appreciate the Court's consideration and the attention the Court has given to this case to date.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Anthony P. Consiglio".

Anthony P. Consiglio

cc: All Counsel (by ECF)

Application GRANTED. If the case does not settle in mediation, the parties should not expect the Court to further extend the discovery stay for additional negotiations. SO ORDERED.

A handwritten signature in blue ink, appearing to read "Barbara C. Moses".

Barbara Moses
United States Magistrate Judge
August 20, 2021